



TRI WINNER IRVING

SEED, TABLESTOCK & PROCESSING POTATOES

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3-31-03

Tri Winner Irving

Presque Isle, Me. 04769

We are writing this letter in response to the proposed rules to ensure food safety. Being a potato sales organization with over 40 years experience in the shipment of fresh produce, it is our considered opinion that this effort to ensure food safety can be accomplished in a much less onerous manner than what is now being proposed. Due to the vagaries of the fresh produce business, such as, customers that employ 'just in time' ordering and inventory control, a large portion of the fresh produce business is transacted on the basis of 'same day' ordering and shipment. This helps us to ensure freshness and quality of product, and allows our customers to employ techniques such as the afore mentioned 'same day' ordering and shipment and 'just in time' delivery and inventory control. All of which contributes to the well being of the american consumer thru cheaper prices and better quality of fresh produce. It is our opinion that the food safety and food quality the american consumer demands can be accomplished much easier, and at much less cost to the american taxpayer than what is being proposed. We feel this safety can be attained at loading point, thru inspection and sealing at loading point, of the trailer being used to transport the product being shipped. In an effort to keep this letter as short as possible, we have not responded to all the concerns we have regarding the proposed requirements. We do feel however that there are many inherent problems in what is now being proposed, which may not be evident to people not actively involved in the fresh produce business. We would be happy to discuss these problems and possible solutions with whom it may concern.

Sincerely, Tri Winner Irving

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